

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ALEK SCHOTT

Plaintiff,

v.

JOEL BABB, in his individual and official capacity; MARTIN A. MOLINA III, in his individual and official capacity; JAVIER SALAZAR, in his individual and official capacity; and BEXAR COUNTY, TEXAS,

Defendants.

Civil Action No. 5:23-CV-00706-OLG-RBF

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE A REPLY IN SUPPORT OF MOTION TO PARTIALLY STRIKE THE
TESTIMONY OF DEFENDANT JOEL BABB'S EXPERT GARY D. HASTON**

Plaintiff Alek Schott respectfully requests a seven-day extension of time to file a reply in support of his motion to partially strike and exclude the testimony of expert Gary D. Haston (Dkt. 91), and states as follows:

1. On January 24, 2025, Plaintiff moved to partially strike and exclude the testimony of Defendant Joel Babb's expert Gary D. Haston. Dkt. 91.
2. On January 30, 2025, Defendant Babb sought an unopposed extension of time until February 7, 2025, to respond to Plaintiff's motion (Dkt. 94), which the Court granted the following day via docket text.
3. Defendant Babb filed his response to Plaintiff's motion on February 7, 2025.
4. Pursuant to Local Rule CV-7(e)(2), Plaintiff's reply is due on February 14, 2025.

5. Because Plaintiff's counsel has imminent litigation deadlines and other personal scheduling constraints, Plaintiff requests an extension of time to file his reply by February 21, 2025.

6. Plaintiff does not seek this extension for purposes of delay, nor will this motion prejudice Defendants.

7. Plaintiff's counsel has conferred with Defendants' counsel, who do not oppose this motion.

Dated: February 12, 2025.

Respectfully submitted,

/s/ Christen M. Hebert

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*Admitted *pro hac vice*

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on February 12, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Christen Mason Hebert
Christen Mason Hebert